

Exhibit H

Lisa A. Hyde

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1 time?

2 A The benefits or risks?

3 Q Yeah.

4 A When I was in the hospital, no.

5 Q So Dr. Henry was the only physician that you
6 discussed the IVC filter with?

7 A I believe so.

8 Q Do you recall that Dr. Henry mentioning
9 anything about filter fracture or perforation?

10 A No.

11 Q Do you recall any conversation with
12 Dr. Henry about his recommendation of a temporary IVC
13 filter?

14 A What I remember was he said these are
15 temporary filters but we're leaving them in. We leave
16 them in, and it's okay.

17 Q Was there any discussion with Dr. Henry or
18 any other doctor at that time about potentially
19 retrieving the filter in the future?

20 A No.

21 Q You were under the belief that the filter
22 was going to be left in?

23 A Yes.

24 Q And that it was going to be left in
25 permanently, was that your belief?

1 A Indefinitely.

2 Q Was this the first time placement of an IVC
3 filter was suggested to you by a doctor?

4 A Yes.

5 Q Was anyone besides your husband present for
6 your conversation with Dr. Henry?

7 A No.

8 Q Were there any other doctors present?

9 A Not that I remember.

10 Q Were you given any written information or
11 pamphlets about IVC filters that you recall?

12 A I don't recall.

13 Q Is there anything else about your
14 conversation with Dr. Henry on that day that we have
15 not discussed that you can recall?

16 A No.

17 Q On February 25th, 2011, you received an IVC
18 filter; is that correct?

19 A Yes.

20 Q And that was implanted by Dr. Henry?

21 A Yes.

22 Q And you consented to treatment with an IVC
23 filter; is that correct?

24 A Yes.

25 (Defendant's Exhibit D was marked for

1 Q Did you see that hematologist in hospital,
2 while you were in the hospital?

3 A I believe I saw him in the hospital, then
4 after.

5 Q And he is the one that told you that you
6 needed to be on blood thinners the rest of your
7 life?

8 A Yes.

9 Q Was there any discussion upon discharge that
10 the filter should be periodically checked for any
11 reason?

12 A No.

13 Q Was there any discussion of follow-up
14 treatment regarding potential removal?

15 A No.

16 Q Do you recall ever speaking to Dr. Henry
17 again after he placed your filter?

18 A No.

19 Q You stated in your Plaintiff Fact Sheet you
20 were first informed about your filter fracture on May
21 16th, 2014; is that correct?

22 A I had the CT scan that day.

23 Q Okay.

24 A Yes. And I was notified on May 19th --

25 Q Okay.

1 sense?

2 A Yes.

3 Q And you mentioned, so you were on blood
4 thinners at that time; correct?

5 A Yes.

6 Q During that time, did you speak to any

7 doctors about removing your IVC filter?

8 A No.

9 Q Or checking it any way with a scan?

10 A No.

11 Q The record shows a few weeks after your
12 filter implant on March 16th, 2011, you went to the
13 Wheaton Franciscan Healthcare Hospital E.R. for chest
14 pain; is that correct?

15 A Yes.

16 Q Can you describe that event, please.

17 A I felt short of breath. Something -- I felt
18 something wasn't right, so I thought I should have it
19 checked out.

20 My sister actually met me at the hospital,
21 so she was there.

22 Q Any other symptoms that led you to go to the
23 E.R. on that day?

24 A No.

25 Q Do you recall about when the shortness of